

Jeremy Script

- Where do you work?
- What is your position?
- How long have you been a special agent at SDNY?
- What kind of cases do you investigate?
- What are some of your responsibilities? (*phone, email analysis*)
- Where did you work before SDNY?
- What was your position at the DOL?
- Can you tell the jury about your education and any credentials you've received?

Bank Affirmation: 1004

- Read bank stipulation (600 AMEX, 601 Chase signature card, 602 Chase records, Citibank 604-609)
- The Gov't offers 600, 601, 602, 604-609.
- Mr. Hamill, please show the witness what has been admitted into evidence as 601.
- Looking at 601, can you tell the jury the name of the bank and account holder.
- Have you reviewed the contents of 602? What are they?
- Are the records in 602 voluminous?
- Were you asked to search 602 for a particular set of transactions?
- What kind of transactions?
- Mr. Hamill, please show the witness what is marked for identification as 900.
- Does 900 fairly summarize the results of your search of 602?
- The gov't offers 900.
- Mr. Hamill, please display 900.
- Can you tell the jury what is summarized in 900?
- What is first date you found an ACH deposit from MCU in the records?
- What is last date you found an ACH deposit from MCU in the records?
- What was the total dollar amount for that time period?

Cablevision Affirmation: 1003

- Read Cablevision affirmation
- The Gov't offers 603.
- Mr. Hamill, please show the jury what is already admitted into evidence as 463J. What are the expenses listed on the first page?
- Mr. Hamill, turn to page 3. What is the account holder's name on this document? What is account number?
- Mr. Hamill, please show the witness 603. Have you had a chance to examine these records?
- What are they?
- Looking at the first page, do you see an account number? Does that match what you just identified on 463J? Who is account holder?
- Looking at bottom right hand corner, what are the services covered under this cablevision bill? (TV, phone, and internet)

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T-Mobile Affirmation: 1002

- Read T-Mobile affirmation.
- The Gov't offers 650-656 into evidence.
- Mr. Hamill, please show the jury what is already in evidence as 463 and turn to page 17. Can you tell the jury the phone provider on this record and the listed account number and account holder?
- Mr. Hamill, please show the jury what is in evidence as 650. Do you see an account number that matches what you just read in 463? What is name?
- Mr. Hamill, can you please turn to page 6 of 656. What services are covered under this bill? (family plan, two lines).

Verizon Affirmation: 1006 and Phone Chart

- Read Verizon affirmation
- The Gov't offers 657-658.
- Mr. Hamill, please show the jury what is evidence as 235 and turn to page 5 (Guagliardo. Can you read the phone number in that entry?
- Mr. Hamill, now please turn to page 8 (Wong). Can you read the three phone numbers in that entry. Are call records for that number contained in 658?
- Did you review the contents of 657, 658, and 650-656?
- Did they contain call records?
- Were the records voluminous in nature?
- Were you asked to search these records for calls and text messages placed or received by certain phone numbers?
- Which phone numbers?
- Mr. Hamill, please show the witness what is marked for identification as 902, 904 and 905.
- Does 902, 904, and 905 fairly and accurately summarize your analysis of the Verizon and T-Mobile records contained in 657, 658 and 650-656?
- The Gov't offers 902, 904, and 905.
- Mr. Hamill, please show the jury 902. What does this chart summarize? Date range?
- Mr. Hamill, please show the jury 904. What does this chart summarize? Date range?
- Mr. Hamill, please show the jury 905. What does this chart summarize? Date range?
- Do you work with SA Laval Jackson? For how long? Do you know his phone number? Did you recognize his phone number in 658? Where is it indicated in chart? Following that call, did you identify any calls the following day between Wong and the defendant?

Oath Affirmation: 1001

- Read Oath affirmation.
- The Gov't offers 562, 750, 751, 752, 753, 754, 755, 756, 761, 762, 763, 765, 766, 769.
- Mr. Hamill, can you show the jury what is evidence as 562?
- What is the email and username listed on 562?
- Have you examined exhibits 750-772?
- In general ,what are they?

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- Mr. Hamill, please show the jury what is in evidence as 761. (birthday at MCU park) Read email.
- Mr. Hamill, please show the jury what is in evidence as 763. Is there an attachment on second page? What is it? What is a 1099?
- Mr. Hamill, please show the jury what is in evidence as 766. (kam wong expense) Read email
- Mr. Hamill, please show the jury what is in evidence as 769. (nets tickets wong) Read email.
- Mr. Hamill, please show the jury what is in evidence as 754 (Greek cruise email). Read email.
- Mr. Hamill, can you please show the jury what is in evidence as 463H and turn to second page. What is description and date? Is that within one days time of the date on 754?

Google Affirmation: 1005

- Read Google affirmation
- The Gov't offers 561, 300, 304, 336, 328.
- What is email and user name on 561?
- What kind of evidence is contained in 337 and 337?
- Were there records voluminous?
- Were you asked to search these exhibits for particular sender/recipeints and key words?
- Who?
- Were you also asked to do a comparison between the number of emails in each preservation?
- I'm showing you 903A, 903 B, 904C, and 904D. Do these exhibits fairly summarize the results of your search of those exhibits?
- The Gov't offer 904A, 903 B, 904C, and 904D.
- Mr. Hamill display exhibits – ask what each one summmzarizes.
- Reagarding 904 D, what does ACH payment mean?
- Of the ACH emails that were present, did you compare to 900 (Chase Chart)? What was result? (matching).
- Mr. Hamill, please show witness what is marked as 300, 304, 336, 338. (have witness read to jury). Follow up questions – what is a 1099, what is BCC, what is DFS.